

Applicant(s): JAMES A. STARKEY
Serial No.: 09/919,052
Filed: July 31, 2001

REMARKS

Claims 1 through 26 were examined. Claims 14 through 26 are allowed. Claims 1 through 3 are rejected. The Examiner objects to claims 4 through 13. Claim 1 is amended. Claims 1 through 26 remain in the application.

Applicant requests reconsideration and reexamination of the above-identified application in view of the amendments made to the specification and claims. The following remarks state Applicant's bases for making this request and are organized according to the Examiner's Action by paragraph number.

Examiner's Action, Paragraph 2

Applicant understands the Examiner's position that pending claims must be "given the broadest reasonable interpretation consistent with the specification". Claim 1 as presented and as amended defines a web page generator. The language in claim 1, given its broadest reasonable interpretation, defines an invention that is patentable over the prior art.

Examiner's Action, Paragraph 3

The Examiner rejects claims 1 through 3 under 35 U.S.C. 103 (a) as being unpatentable over U. S. Patent No. 5,987,480 to Donohue (the "Donohue patent") and in view of U. S. Patent No. 6,212,530 to Kadlec (the "Kadlec patent"). To

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summarize, the Examiner argues that with respect to claim 1, the Donohue patent teaches a web page generator with an application store, an interface, an application manager, a templates manager and a template store. The Examiner recognizes the Donohue patent does not explicitly indicate that the application manager produces a representation of a web page, but considers that the Kadlec patent discloses such a method.

With respect to claim 2, the Examiner argues that the Donohue patent teaches a templates manager with means for generating a template object for each template in the application and template set object for the application.

With respect to claim 3, the Examiner argues that the Donohue patent teaches a system in which a templates manager includes a pointer to the template set object for the application.

Applicant respectfully traverses these rejections.

Applicant has previously described the Donohue patent.

The Kadlec patent discloses a computer method and apparatus for generating and maintaining a structured collection of documents. Specifically, the Kadlec patent discloses a conceptual model with entities and relationships among entities. Documents are categorized and subsequently maintained with respect to the entities in the entity-

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relationship diagram. A hierarchy of process-message matrices is employed to determine the communications or dynamic exchanges of message entities in the modeled system and reflected in the entity-relationship diagram. A relational database implements the model and holds document contents needed to automatically generate the collection of documents in a complete formatted manner for printing and/or compiling through word processing and/or compilation and linking means. The database also enables automatic hypertext generation by mapping interdependencies or relationships between the entities into interdependencies or links between the documents.

Applicant first respectfully submits that a person of ordinary skill in the art looking at the Donohue patent would not incorporate any of the structure or concepts in the Kadlec patent. More specifically, the Donohue patent is directed to a method for generating web pages. The documents in accordance with the Donohue patent are entire web pages. The Donohue patent discloses a methodology for converting a request for a document into the presentation of that document. Applicant therefore respectfully submits that there is no reason for a person of ordinary skill in the art to look at the Kadlec patent to implement the structures and functions of that patent because they are just not needed in the Donohue patent.

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Even if the references are combined, Applicant respectfully submits that claim 1 defines a web page generator that is not disclosed or suggested by the Donohue and/or Kadlec patents taken singly or in combination.

Claim 1 defines a template store on a server that stores templates. To the extent the web server in the Donohue patent constitutes a template store, it does not constitute a template store as defined in claim 1. Each template in the Donohue patent has a unique name. Specifically, each document in the Donohue patent is defined by the combination of a directory path and a name. The result is a unique expression or document name. In the Donohue patent a request for a document template can not identify two or more documents with the same name because two files can not exist in the same directory with the same name. Claim 1 defines the template store as including templates each having a name. Further, the claim states that two templates can have the same name. This enables "overloading" of the templates. Overloading exists when the same template name identifies multiple templates in the template store so the template names need not be unique.

As the Donohue patent is understood, incoming requests establish the name of a document. Applicant sees nothing in the Donohue patent that constitutes an application store with applications that identify templates by name.

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Claim 1 defines an application manager that processes a selected application and includes the identification of all the templates in the template store related to the application by name. Consequently, if an application requests a particular template by name and more than one template exists, all the templates will be available to the application manager. It is then the function of the templates manager for selecting a specific one of the templates that each have the same name. This is accomplished through the use of various selection criteria. As a specific example, reference is made to FIG. 4 that depicts seven templates each having the name DRLPAGE. As will be apparent from the disclosure, each template, may have a different content.

The advantage of this invention is found in the ability to utilize one template as a basis for other templates. That is, a template can be constructed by inheriting the template contents from a previously existing template having the same name. This has proven to be a very powerful tool in facilitating the generation of web pages. Applicant respectfully submits, however, that nothing in the Donohue patent or the Kadlec patent suggests that such a concept of utilizing the same name to identify multiple templates is possible.

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Applicant further submits that nothing in either reference discloses the concepts of generating a template object and a template set object as those are defined in claim 2. Further, Applicant respectfully submits that the further modification of the invention as defined in claim 2 by defining a pointer to a template set object would also not be obvious in view of the Donohue or Kadlec patents because the Donohue and Kadlec patents do not disclose the combination of template objects and template set objects.

Examiner's Action, Paragraph 4

The Examiner objects to claims 4 through 13 as being dependent upon a rejected base claim. Applicant respectfully submits that in view of the amendments and arguments, claims 1 through 3 are patentable, so rewriting claim 4 as an independent claim should not be required.

Examiner's Action, Paragraph 5

Applicant acknowledges the Examiner's decision to allow claims 14 through 26 and accepts the definition for the reason for allowance.

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Summary

Applicant has amended claim 1 to more clearly define the invention more clearly. Applicant respectfully submits that neither of the cited Donohue and Kadlec patents taken singly or in combination disclose or suggest the invention as defined in claims 1 through 3. Applicant therefore respectfully requests the Examiner to reconsider the rejection and to allow claims 1 through 13 and to issue a Notice of Allowance for the application with claims 1 through 26.

If there are any questions or the Examiner feels a telephonic interview would be beneficial, we urge the Examiner to call us collect.

Respectfully Submitted,



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